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*Counsel to Ad Hoc Group of Supporting Counsel*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT, LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 23-12825 (MBK)

**APPLICATION FOR PRO HAC VICE ADMISSION OF MATTHEW MICHELI**

Ad Hoc Group of Supporting Counsel (the “Ad Hoc Group”), by and through their counsel, Cole Schotz P.C. respectfully submit this application (the “Application”), for the *pro hac vice* admission of Matthew Micheli, and represents as follows:

1. On April 4, 2023, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey.

2. Matthew Micheli, a counsel in the firm of Paul Hastings LLP has represented the Ad Hoc Group in connection with this matter. Because of his familiarity with the facts and

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

circumstances relevant to the Ad Hoc Group in this matter, the Ad Hoc Group request that Mr. Micheli be allowed to appear *pro hac vice* in the within matters.

3. As set forth in the Certification of Mr. Micheli, annexed hereto as **Exhibit A**, Mr. Micheli is a member in good standing of the bar of the State of Illinois. Mr. Micheli is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Micheli has represented that he will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant the Ad Hoc Group's Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matter.

Respectfully submitted,

COLE SCHOTZ P.C.  
Attorneys for Ad Hoc Group of Supporting Counsel

By: /s/ Michael D. Sirota  
Michael D. Sirota

Date: April 24, 2023